Remarks

Applicants respectfully request reconsideration and allowance of the captioned application.

The Office Action rejected all claims as being anticipated by Henneuse. Applicants traverse the rejection.

Independent claim 1 is a "method of providing data relating to a customer contact with an automatic call distribution (ACD) system to and an ACD agent." The Office Action identifies the Henneuse server system as being an ACD system and the Henneuse scheduler as being an ACD agent. However, Henneuse does not disclose that its server system is an ACD system (or that its scheduler is an ACD agent), and does not disclose any ACD system (or ACD agent).

An ACD system is used to distribute contacts (such as from a customer of an organization) among a group of agents of the organization. It directs these contacts to various agents based on some algorithm. This is discussed in the first three pages of the captioned application. It is also common terminology among those skilled in the pertinent art. For example, the definition in Newton's Telecom Dictionary (18th ed.), p. 74 (CMP Books 2002) states that "distributing calls logically is the function most people associate with an ACD." It goes on to explain that possible management information functions of an ACD are even more valuable, such as tracking when, how many, and from where contacts arrive, and such as knowing how many contacts are abandoned by customers put on hold.

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Henneuse has nothing to do with an ACD system. It relates to an event scheduler. The Henneuse server creates template pages to which the parties can submit information pertinent to an event, it may process that information to develop a potential schedule, and it may route messages among the parties. Henneuse, 1:43 - 2:12. In the last capacity, the Henneuse server may function as a network server. A network server routes a message to predetermined addressees in accordance with the message's routing instructions. Unlike an ACD, a network server does not select a previously unidentified addressee based on some algorithm. In the ACD environment, the person generating a contact with an organization generally does not include instructions selecting the particular agent of the organization to whom the contact will be routed. It is the ACD that makes that selection, and the Henneuse server is not an ACD.

The first limitation of claim 1 requires, <u>inter alia</u>, that a URL be provided **"from the ACD system."** As discussed above, Henneuse has nothing to do with an ACD system, and cannot disclose this claim limitation. Independent claim 25 is another method claim with the same first limitation. Independent claims 14 and 20 are system claims that each includes a similar limitation. "To anticipate, every element and limitation of the claimed invention must be found in a single prior art reference, arranged as in the claim." <u>Brown v. 3M</u>, 265 F.3d 1349, 1351 (Fed. Cir. 2001) (citations omitted). Henneuse does not disclose the limitation requiring providing a URL from an ACD system, and

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cannot anticipate any of the independent claims. Consequently, it cannot anticipate any of the claims.

In addition, there are numerous other claim limitations which are not disclosed by Henneuse. For example, in connection with claims 3 and 25, the Office Action erroneously asserts that Henneuse teaches attaching information to the URL before providing the URL to the browser. This is not disclosed by Henneuse in the places cited by the Office Action or anywhere else. The claimed URL is one provided from the ACD system (which Henneuse does not disclose) to a browser of the ACD agent (which Henneuse does not disclose). Even accepting, arguendo, that the Henneuse server system is an ACD system and the scheduler is an ACD agent (as erroneously asserted by the Office Action), Henneuse does not disclose attaching information to the URL. The URL, or universal resource locator (see application at 3:13-14) is a network address (see Newton at 785), and Henneuse never mentions attaching information to it.

Furthermore, notwithstanding contrary assertions in the Office Action, Henneuse does not disclose attaching to the URL contact processing information which includes at least one of: type of the customer contact, identification of the agent, and treatment of the contact by the ACD - as required by claims 4 and 25. The claimed URL is the one with which the web page corresponds, the web page including the data relating to the customer contact (see claim 1). Henneuse does not disclose that the URL for the web page includes the identification of the

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scheduler (whom the Office Action erroneously asserts is the ACD agent). It also does not disclose that the URL includes either of the other two categories of information. Different types of contacts can be web-site inquiries, e-mails, etc. (<u>see</u> <u>e.q.</u> application at 1:11-18), and different contact treatments can be different programmed scripts used by the ACD before directing the contact to an agent (<u>see</u> <u>e.q.</u> application at 7:8-10). It is not surprising that Henneuse never mentions any of these things, since it does not relate to an ACD system.

Similarly, Henneuse does not disclose attaching any of the contact-derived information, listed in claims 5 or 25, to the URL for the web page. Henneuse does not disclose that data in the web page includes at least some information attached to the URL by the ACD, as required by claims 6 and 25. Henneuse does not disclose selecting the claimed URL for the web page based on information about the contact available to the ACD, as required by claims 7 and 25. Henneuse does not disclose obtaining at least some of the data in the web page based on at least some information attached to the URL by the ACD, as required by claims 8, 18 and 25. The Office Action cites to the same portions of Henneuse in connection with each of these claims, but neither those portions nor any other portions of Henneuse disclose anything about information attached to the claimed URL.

Since, as discussed above, Henneuse does not disclose an ACD system or an ACD agent, it does not disclose sending the claimed URL to <u>ACD console software</u> of the <u>ACD agent</u>, and providing the

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URL to the <u>ACD agent</u>'s browser from the <u>ACD console software</u>, as required by claim 9. Similarly, Henneuse does not disclose sending the claimed URL directly to the <u>ACD agent</u>'s browser from the <u>ACD system</u>, as required by claim 10. Similarly, Henneuse does not disclose displaying the web page to the <u>ACD agent</u>, as required by claims 13, 24 and 25. Henneuse does not disclose an agent station coupled with the <u>ACD system</u> as required by claim 14, or providing the claimed URL to a browser of the <u>ACD agent</u> as required by claims 1 and 25. Henneuse does not disclose the <u>ACD</u> being capable of <u>attaching information to the claimed URL</u>, as required by claims 16 and 22. Henneuse does not disclose the <u>ACD</u> being capable of collecting contact-derived information, as required by claims 17 and 23. It is noted that applicants cannot determine what portion of Hennuese was intended to be cited by the Office Action in support of its rejection of claim 10. The Office Action cites a non-existent column, that was obviously a clerical error.

The applicants submit that the claims are in condition for allowance, and request reconsideration and allowance. Should the Examiner be of the opinion that a telephone conference would expedite prosecution of the application, the applicants request the Examiner to call the undersigned at the below-listed telephone number.

Respectfully submitted,

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